



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

NOV 07 2016

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

**Article Number: 7015 3010 0001 6837 3786**

Mr. Brian Gove  
Colonial Processing, Inc.  
1930 S. 6<sup>th</sup> Street  
Camden, NJ 08104

RE: Request for Information ("RFI") Pursuant to Section 308 of the Clean Water Act  
Compliance Evaluation Inspection Report ("CEI") conducted on April 4, 2016 at  
Colonial Processing, Inc.  
Docket No. CWA-IR-17-006

Dear Mr. Gove:

The United States Environmental Protection Agency ("EPA") is charged with the protection of human health and the environment under the Clean Water Act ("CWA" or "Act"), 33 U.S.C. §§ 1251 *et seq.* Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

Colonial Processing, Inc. is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), to submit to EPA documentation with accompanying photographs (if applicable) of the following no later than deadlines specified:

1. No later than thirty (30) calendar days of receipt of this RFI, submit documentation with accompanying photographs (if applicable) of the measures taken to address the Items of Concern specified in the enclosed Inspection Report.

All information required to be submitted by this Request for Information shall be sent by certified mail or its equivalent to the following address:

Douglas McKenna, Chief  
Water Compliance Branch  
Division of Enforcement and Compliance Assistance  
290 Broadway, 20<sup>th</sup> Floor  
New York, NY 10007-1866

Any documents to be submitted by Colonial Processing Inc. must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

“I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations.”

Failure to provide the required information may subject the facility to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the facility to ineligibility for participation in work associated with Federal contracts, grants or loans.

Enclosed is a copy of the inspection report detailing EPA's findings from the inspection April 4, 2016 at Colonial Processing, Inc.

If you have any questions regarding this Request for Information or the enclosed Inspection Report, please feel free to contact Cyndy Kopitsky of my staff via phone at (212) 637-3832 or via email at [kopitsky.cyndy@epa.gov](mailto:kopitsky.cyndy@epa.gov).

Sincerely,



Douglas McKenna, Chief  
Water Compliance Branch

Enclosures

cc: Marcedius Jameson, Administrator, Water and Land Use Enforcement, NJDEP  
(w/enclosures)



United States Environmental Protection Agency  
Washington, D.C. 20460  
**Water Compliance Inspection Report**

Form Approved.  
OMB No. 2040-0057

**Section A: National Data System Coding (i.e., PCS)**

Transaction Code		NPDES				yr/mo/day			Inspection Type		Inspector			Fac Type	
1 N	2 5	3			11	1 1 6 0 4 0 4	17		18 C		19 F			20 2	

Remarks

21															66
Inspection Work Days		Facility Self-Monitoring Evaluation Rating				QA		-----Reserved-----							
67	1		69					70	3				71	N	80
													72	N	
													73		
													74		
													75		

**Section B: Facility Data**

Name and Location of Facility Inspected (for industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Times/Dates	Permit Effective Date		
Colonial Processing, Inc. 1930 S. 6 <sup>th</sup> Street Camden, NJ 08104		10:00 AM			
		Exit Times/Dates	Permit Expiration Date		
		11:15 AM			
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)		Other Facility Data			
Brian Gove 856-966-3313 x10 Fax: 856-541-2409		SIC Code: 3479  Lat/Long: 39.920070/ -75.117558			
Name, Address of Responsible Official/Title/Phone and Fax Number(s)					
Brian Gove 1930 S. 6 <sup>th</sup> Street Camden, NJ 08104 856-966-3313 x10 Fax: 856-541-2409					
		Contacted			
		X Yes No			

**Section C: Areas Evaluated During Inspection (Check only those areas evaluated)**

	Permit	Flow Measurement	X	Operations & Maintenance	CSO/SSO (Sewer Overflow)
	Records/Reports	Self-Monitoring Program		Sludge Handling/Disposal	Pollution Prevention
X	Facility Site Review	Compliance Schedules		Pretreatment	Multimedia
	Effluent/Receiving Water	Laboratory	X	Storm Water	Other:

**Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)**

See attached report.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Cyndy S. Kopitsky, Physical Scientist 	EPA/DECA-WCB/(212) 637-3832 FAX:x3953	10.27.16
Signature of Management Q/A Reviewer	Agency/Office/Phone and Fax Numbers	Date
Justine Modigliani, P.E., Chief, Compliance Section 	EPA/DECA-WCB/(212) 637-4268/FAX:x3953	11/3/16





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 2, DECA-WCB**  
**20<sup>th</sup> Floor, 290 Broadway, New York, NY 10007**

**COMPLIANCE EVALUATION INSPECTION REPORT**

<b>Compliance Evaluation Inspection:</b> Colonial Processing, Inc.	
<b>Inspection Date:</b> April 4, 2016	<b>Inspection Time:</b> 10:00AM – 11:15AM
<b>EPA Inspector:</b> Cyndy S. Kopitsky, Environmental Scientist, USEPA Region 2, DECA, Water Compliance Branch (212) 637-3832 & Andrew Dinsmore, Stormwater Team Leader USEPA Region 3 (215) 814-2788	
<b>NJDEP Representative:</b> Sandy Cowley (609) 439-9537	
<b>On-Site Representative:</b> Brian Gove (856) 966-3313	
<b>Site Information:</b>	Colonial Processing, Inc. 1930 S. 6 <sup>th</sup> Street Camden, New Jersey 08104

**INTRODUCTION:**

On April 4, 2016, the United States Environmental Protection Agency (“EPA”) conducted a Compliance Evaluation Inspection (“CEI”) at Colonial Processing, Inc. located at 1630 S. 6<sup>th</sup> Street, Camden, New Jersey (the “Site” or “Facility”) to determine compliance with the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (5G2).

As identified on their website, Colonial Processing, Inc. (“CPI”) was founded in 1971 and has been in the metal cleaning and painting services since its conception. CPI specializes in abrasive blasting and the application of all types of coatings. The facility is located on 56,000 sq. ft. of enclosed shop space and 3 acres of outdoor yard. CPI specializes in applying industrial-grade coatings such as epoxies, zinc primers, mastics, urethanes, military spec. paints, enamels among many other varieties of coatings.

Defined in Part 2.2 of the Camden NJ Wastewater Operations and Maintenance Plan August 2015, the wastewater collection system is primarily combined and a majority of the wastewater and a portion of the stormwater is conveyed to the Camden County Municipal Utilities Authority (CCMUA).

**INSPECTION PROCEDURE:**

Upon arrival at the Site, EPA inspectors presented credentials to Mr. Gove of Colonial Processing, Inc. EPA conducted an opening conference with Mr. Gove, conducted a field inspection, and took

photographs of any areas of concern at the Site and surrounding areas. Mr. Gove told EPA inspectors that this facility was unpermitted based on the indoor only operation process.

### **FINDINGS & OBSERVATIONS:**

At the time of the inspection, Mr. Gove was onsite and informed EPA inspectors that:

- Colonial Processing has been at this location since 1985
- There are 13 employees on staff
- Colonial Processing conducted sand blasting outdoors 5 years ago and has since discontinued all blasting and painting outdoors.
- There were no indoor floor drains
- Because of the extensive fumes, the facility safety training focuses on air issues

At the time of the inspection, EPA observed the sand blasting process was conducted indoors at the facility in a large enclosed warehouse. EPA observed an accumulation of dust on surfaces and fumes in the air from this process.

During the walkthrough EPA observed a diesel tank outside against the building. Mr. Gove informed the EPA inspectors that the diesel fuel was used for heating and equipment operation as seen in photo DSCN7011.

During the walkthrough, EPA observed that the paint drums stored outside were marked, covered, and elevated above ground on wood pallets as seen in photo DSCN7012.

During the walkthrough, EPA observed large storage trailers on the yard at the site, the majority of them were empty and some were used for storage.

### **AREAS OF CONCERN:**

At the time of the inspection, the Non-Applicability Form (NAF) and/or a Permanent No Exposure Certification Form was unavailable for review or has not yet been filed with NJDEP.

At the time of the inspection, EPA observed that debris and sand was collecting on one of the yard drains as seen in photo DSCN7018.

### **CLOSING:**

A closing conference was held with Mr. Gove explaining the findings of the inspection. Any additional questions were answered at that time.

### **ATTACHMENTS:**

Photographs

**Attachment 1 - Photograph Log: Colonial Processing Inc., 1930 S. 6<sup>th</sup> Street, Camden New Jersey. Unedited photographs taken on April 5, 2016 by Cyndy S. Kopitsky, Physical Scientist, DECA-WCB, USEPA Region 2 with EPA Olympus Stylus camera.**

DSCN7006	Spray paint area
DSCN7007	Spray paint area
DSCN7008	Paint storage
DSCN7009	Painting area
DSCN7010	Painting area
DSCN7011	Fuel tank
DSCN7012	Paint storage
DSCN7013	Small drain in lot
DSCN7014	Sewer drain
DSCN7015	Drain
DSCN7016	Sewer drain
DSCN7017	Drain
DSCN7018	Storm drain
DSCN7019	Storage and parking area







DSCN7006



DSCN7007



DSCN7008



DSCN7009



DSCN7010



DSCN7011



DSCN7012



DSCN7013





DSCN7014



DSCN7015



DSCN7016



DSCN7017

4/04/2016

Colonial Processing, Inc. Camden NJ CEI



DSCN7018



DSCN7019